

Gregory H. Guillot, Admitted *pro hac vice*
ggmark@radix.net

GREGORY H. GUILLOT, P.C.
13455 Noel Road, Suite 1000
Dallas, TX 75240
Phone: (972) 774-4560
Fax: (214) 515-0411

John L. Krieger, Nevada Bar No. 6023
JKrieger@LRLaw.com
LEWIS AND ROCA LLP
3993 Howard Hughes Parkway, Suite 600
Las Vegas, NV 89169
Phone: (702) 949-8200
Fax: (702) 949-8389

George L. Paul, Admitted *pro hac vice*
GPaul@LRLaw.com
Robert H. McKirgan, Admitted *pro hac vice*
RMckirgan@LRLaw.com
LEWIS AND ROCA LLP
40 North Central Avenue, Suite 1900
Phoenix, AZ 85004
Phone: (602) 262-5326
Fax: (602) 734-3857

Attorneys for Plaintiff,
DONNA CORBELLO

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DONNA CORBELLO, an individual,
Plaintiff,

vs.

THOMAS GAETANO DEVITO, an
individual, *et al.*,
Defendants.

Case No. 2:08-cv-00867-RCJ-PAL

**PLAINTIFF'S UNOPPOSED MOTION
FOR EXTENSION OF TIME TO FILE
REPLY BRIEF IN SUPPORT OF
MOTION FOR RECONSIDERATION**

(Seventh Request)

Plaintiff Donna Corbello, by her attorneys, and pursuant to LR 6-1 and 7-2, herewith requests a final extension of time in which to file Plaintiff's *Reply to New Defendants' Memorandum in Opposition to Plaintiff's Motion for Reconsideration by the United States Magistrate Judge of Her Order Dated November 12, 2010*, and *New Defendants' Supplement to Memorandum in Opposition to Plaintiff's Motion for Reconsideration* ("Reply"), through

1 Monday, January 31, 2011. Whereas the current deadline for the *Reply* is Friday, January 28,
2 2011, the requested extension would continue this deadline for one business day. This is
3 Plaintiff's seventh and final request for an extension of time.

4 Plaintiff submits that good cause exists for the grant of the requested extension. Counsel
5 have continued to work diligently on the *Reply*, and it is almost complete. However, the current
6 draft exceeds the page limits set forth in the Local Rules, and the final editing must be completed
7 to make certain it is as concise as possible, and a motion for leave to file excess pages must be
8 prepared to accompany the filing. Additionally, the filing will be accompanied by two electronic
9 disks, that will be filed under seal, and must be tendered to the Court personally on the filing
10 date. The requested extension will provide Plaintiff with time to complete these steps, and file
11 the finalized document and exhibits with the Court.

12 Plaintiff's counsel have conferred with defense counsel concerning this request, and
13 Defendants have indicated that they do not oppose it. Moreover, it is not tendered for purposes
14 of delay, and the filing will still occur well in advance of the currently-scheduled hearing.

15 IN VIEW OF THE ABOVE, Plaintiff respectfully requests entry of the attached *Order*,
16 indicating that she may file and serve her *Reply* on or by January 31, 2011.

17 Dated: January 28, 2011

18 Respectfully submitted:

19 /s/ Gregory H. Guillot

20 Gregory H. Guillot

21 George L. Paul

22 John L. Krieger

23 Robert H. McKirgan

24 Attorneys for Plaintiff, Donna Corbello

25 IT IS SO ORDERED:

26 
27 The Honorable Peggy A. Leen
28 UNITED STATES MAGISTRATE JUDGE

DATED: February 2, 2011

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b), I certify that on January 28, 2011, I electronically filed the foregoing motion and this certificate of service with the clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Lawrence B. Hancock
Christopher B. Payne
Greenberg Traurig, LLP
1000 Louisiana
Suite 1800
Houston, TX 77002

Booker T. Evans, Jr.
Greenburg Traurig, LLP
2375 East Camelback Road
Suite 700
Phoenix, AZ 85016

Alma Chao
Greenburg Traurig, LLP
3773 Howard Hughes Parkway
Suite 500 North
Las Vegas, Nevada 89169

Attorneys for Thomas Gaetano DeVito

Daniel M. Mayeda
LEOPOLD, PETRICH & SMITH, P.C.
2049 Century Park East, Suite 3110
Los Angeles, California 90067-3274

David S. Korzenik
MILLER KORZENIK SOMMERS LLP
488 Madison Avenue, Suite 1120
New York, New York 10022-5702

Samuel S. Lionel
Todd Kennedy
LIONEL, SAWYER & COLLINS
300 So. 4th Street #1700
Las Vegas, Nevada 89101

Attorneys for Defendants Frankie Valli, Robert J. Gaudio, Marshall Brickman, Eric S. Elice, Des McAnuff, DSHT, Inc., Dodger Theatricals, Ltd., and JB Viva Vegas, L.P.

/s/ Gregory H. Guillot